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November 6, 2023

## VIA ECF

Honorable Kenneth M. Karas U.S. District Court Judge The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse 300 Quarropas Street White Plains, NY 10601

Re: United States v. Laquan Falls, 22-cr-446 (KMK)

Dear Judge Karas:

I write, respectfully, pursuant to the Criminal Justice Act, to request the appointment of associate counsel to assist in the above referenced case. Specifically, I am requesting the appointment of Diane Ferrone, Esq. at an hourly rate of \$125 (the presumptive associate rate for someone with Ms. Ferrone's experience), with approval of 50 hours. Ms. Ferrone has been appointed associate counsel on numerous CJA cases in the Southern District of New York.

Mr. Falls is charged with one count of felon in possession of ammunition, pursuant to 18 U.S.C. Section 922(g). Trial in this matter is scheduled for February 5, 2024.

If appointed, Ms. Ferrone would assist with, among other things, researching legal issues for potential motions, investigating the relevant factual background and defenses, drafting motions, and preparing for Mr. Falls' defense at trial.

I am conscious of the importance of preventing the needless expenditure of CJA funds. Consistent with the goals of conserving resources, I believe the appointment of Ms. Ferrone in this case will result in savings by relieving me from performing tasks that would be more expensive due to my higher bill rate.

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Thank you for your consideration in this matter. I am, of course, available to provide more information at the Court's convenience.

Granted.

Respectfully submitted,

So Ordered.

/s Francis L. O'Reilly

11/6/23

Francis Lee O'Reilly